

This oral testimony was given by William Broydrick on behalf of Malaysian Rubber Export Promotion Council. Additional information is available at the Dept. of Justice, Washington, DC.

Good afternoon Members of the Council, I am Bill Broydrick, representing the Malaysian Rubber Export Promotion Council. Thank you for the opportunity to comment on the relatively recent administrative rule change related to the use of latex gloves in the food service industry.

A better understanding of latex advancements and health benefits will show that the prohibition of *all* latex gloves is unwarranted. I propose that the current rule be amended to only **exclude powder-free, low protein latex gloves** from use in the food service industry.

It is of the upmost concern to protect glove users and food consumers in the food industry. Latex gloves used in the food industry protect against the transmission of contaminants for both users and consumers. As shown by studies time and time again, modern, powder free, low protein latex gloves provide superior barrier protection and have a high resistance to tearing. Latex gloves can also reseal after a small puncture, unlike other gloves. They are still widely used in the food industry and in the performance of surgical and medical procedures. **Low protein, powder free latex gloves** are recommended by FDA, NIOSH, OSHA, ACAAI and AAAAI, which lead studies on work place safety and allergies.

While a *small* percentage of glove users are sensitized to latex protein, it is *crucial* to note that due to advancements in glove manufacturing technologies, today's low-protein powder-free gloves have *drastically* reduced protein content and subsequently, *markedly reduced* sensitization and the incidences of allergies in the work place.

Moreover, The FDA has stated that data linking latex proteins in foods to allergic reactions is based on anecdotal evidence and is very weak. Moreover, there are no reported deaths caused by latex protein allergies through food ingestion. FDA also permits low protein, powder free gloves in medical settings.

The current prohibition of all latex gloves will open the market to the use of alternative synthetic gloves which can pose health hazards for both glove users and consumers. Some latex gloves, like vinyl, can leach out highly toxic chemicals used during their manufacturing process. These chemicals can result in damage to kidney function, liver function, heart function and reproductive issues. Synthetic gloves may also contain chemical accelerators to which an employee may develop an allergic contact dermatitis. Additionally, latex gloves are environmentally friendly and biodegradable—most synthetic gloves are not.

In summary:

1. Low-protein, powder free latex gloves are the most effective means of barrier protection for glove users in the medical and food industries. If the legislature was to *completely* phase out all latex gloves, synthetic alternatives of lesser quality would have to be used. A complete phase out when only a *small* percentage of users are affected by latex allergies is not warranted.

Because of the new low-protein, powder-free latex, those sensitive to the latex proteins *are* able to work side by side with latex glove users.

Thus, the practical solution for latex sensitive individuals is to provide alternative synthetic gloves to those who *are* sensitive...not to *completely* phase out all latex gloves altogether.

2. **Again, the FDA has stated that data linking latex proteins in foods to allergic reactions is based on anecdotal evidence and is very weak.**

While we must be responsive to the needs of the small percentage of latex sensitive individuals, we must still provide the excellent barrier protection of latex gloves to those who are not latex sensitive. With these factual findings in mind, we propose the submitted substitute amendment which will only ban high-powder, high-protein latex gloves.